

March 27, 2020

**Via CM/ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District Of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re:     *Cara Nasisi et al. v. Comprehensive Health Management, Inc.***  
**Case No. 1:19-cv-4132-KPF**  
***Joint Request for Further Extension of Time***

Dear Judge Failla:

On November 18, 2019, the Court issued an Order on the parties' Agreed Motion to Conditionally Certify a Narrowed Class and Approve Notice to Potential Plaintiffs in the Collective. *See* Dkt. No. 73. In that Order, the Court ordered that the parties file a Supplemental Proposed Civil Case Management Plan and Scheduling Order within 120 days of entry of the order, i.e., by Monday, March 16th. On Friday, March 13<sup>th</sup>, this Court granted an extension of time to file the Supplemental Proposed Civil Case Management Plan and Scheduling Order through Monday, March 30<sup>th</sup> as the joint request of the parties.

The basis of the previous request for extension of time was that the parties have been discussing a potential mediation of this matter that would preclude the need for further discovery. Defendant is an operator of health plans in New York, New Jersey, Florida, Illinois and other states that have been heavily impacted by the COVID-19 public health crisis. Due to the focus on exigent legal issues relating to this crisis, Defendant has been unable to reach a resolution on whether to mediate this matter. Consequently, the parties respectfully request that their deadline to submit a Supplemental Proposed Civil Case Management Plan and Scheduling Order be extended by an additional seven (7) days, through Monday, April 6th.

No other scheduled dates will be impacted by the requested extension of time. The parties appreciate the Court's consideration of this request.

Jointly and respectfully submitted,

Hon. Katherine Polk Failla  
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/s/ Philip A. Goldstein  
Philip A. Goldstein  
*Counsel for Defendant*

/s/ Maureen A. Salas  
Maureen A. Salas  
*Counsel for Plaintiffs*

cc: All Counsel of Record via CM/ECF

SO ORDERED:

Date: March 27, 2020  
New York, New York



Hon. Katherine Polk Failla